

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

TYRONE B. HENDERSON, SR.)	
KELVIN THOMAS, RONALD JOHNSON)	
and PAMELA EDWARDS,)	
<i>on behalf of themselves and</i>)	
<i>all others similarly situated,</i>)	
)	
Plaintiffs,)	Case No. 3:13-cv-00029-REP
)	
v.)	
)	
BACKGROUNDCHECKS.COM,)	
Trading as ebackgroundchecks.com)	
)	
Defendants.)	
)	

PLAINTIFFS' SECOND SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES

COMES NOW the Plaintiffs, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and makes the following supplemental disclosures to Defendant. These initial disclosures are based on information reasonably available to Plaintiffs at this time. Plaintiffs reserve the right to supplement these disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these supplemental disclosures, Plaintiffs do not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, and this action or any other action. Plaintiffs also do not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

I. Individuals Likely to Have Discoverable Information

k. Shirley Johnson
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone

Ronald Johnson's spouse has personal knowledge concerning her husband's attempts to obtain employment, the wages that he lost as a result of her husband being unable to obtain employment due to the inaccurate and incomplete information in his consumer report. Mrs. Johnson witnessed first hand the frustration, anguish and embarrassment her husband experienced as he attempted to resolve the inaccurate and incomplete information contained in his consumer report and his attempt to obtain employment in the face of those inaccuracies.

l. Robert Johnson
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 – Telephone

Mr. Johnson's brother has personal knowledge concerning his brother, Ronald Johnson's attempts to obtain employment, the wages that Ronald lost as a result being unable to obtain employment because of the inaccurate information in his consumer report. Robert Johnson loaned his brother, Ronald money on several occasions to pay bills that he could not pay because he was unemployed. Robert has witnessed first hand the frustration, anguish and embarrassment his brother, Ronald experienced as he attempted to resolve the inaccurate and incomplete information contained in his consumer report and his attempts to obtain employment in the face of those inaccuracies.

m. Richard Groover
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 – Telephone

As Mr. Johnson's pastor, Mr. Groover has personal knowledge concerning Mr. Johnson's attempts to obtain employment, the wages that Mr. Johnson lost as a result of being unable to obtain employment due to the inaccurate and incomplete information contained in Mr. Johnson's consumer reports. Mr. Groover has witnessed first hand the frustration, anguish and embarrassment Mr. Johnson has experienced as he attempted to resolve the inaccuracies in his consumer report and his attempts to obtain employment in the face of those inaccuracies.

n. Kierstan Groover
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
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Mrs. Groover has personal knowledge concerning Mr. Johnson's attempts to obtain employment, the wages that Mr. Johnson lost as a result of being unable to obtain employment due to the inaccurate and incomplete information contained in Mr. Johnson's consumer reports. Mrs. Groover has witnessed first hand the frustration, anguish and embarrassment Mr. Johnson has experienced as he attempted to resolve the inaccuracies in his consumer report and his attempts to obtain employment in the face of those inaccuracies.

o. Shane Thomas
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 – Telephone

Kelvin Thomas' spouse has personal knowledge concerning her husband's attempts to obtain employment, the wages he lost as a result of being unable to obtain employment due to the inaccurate and incomplete information in his consumer report. Mrs. Thomas witnessed first hand the frustration, anguish and embarrassment her husband experienced as he attempted to resolve the inaccurate and incomplete information contained in his consumer report and his attempts to obtain employment in the face of those inaccuracies.

p. Roderick Edwards
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 – Telephone

As a friend of Mr. Thomas, Mr. Edwards has personal knowledge of Mr. Thomas' attempts to obtain employment, the wages that Mr. Thomas lost as a result of being unable to obtain employment due to the inaccurate and incomplete information contained in his consumer report. Mr. Edwards also has witnessed first hand the frustration, anguish and embarrassment Mr. Thomas has experienced as he attempted to resolve the inaccuracies in his consumer reports and his attempts to obtain employment with various cable companies in the face of those inaccuracies.

q. Joseph Wright
c/o CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 – Telephone

As a friend of Mr. Thomas, Mr. Wright has personal knowledge of Mr. Thomas' attempts to obtain employment, the wages that Mr. Thomas lost as a result of being unable to obtain employment due to the inaccurate and incomplete information contained in his consumer report. Mr. Edwards also has witnessed first hand the frustration, anguish and embarrassment Mr. Thomas has experienced as he attempted to resolve the inaccuracies in his consumer reports and his attempts to obtain employment with various cable companies in the face of those inaccuracies.

r. Jerry Thomas
Enviroclean USA, LLC.
560 Dutch Valley Road NE #2213
Atlanta, GA 30324-5394

Mr. Thomas has personal knowledge his decision not to hire Pamela Edwards as a result of the information he received as a result of her background report prepared by the Defendant.

s. Justin Roberts (employee of backgroundchecks.com)

Mr. Roberts provided Ms. Edwards backgroundchecks.com report electronically to Ms. Edwards on or about January 24, 2013.

II. Copies of Additional Documents in Possession of Plaintiffs

Other than those documents obtained from any Defendant in discovery, the Plaintiffs have the following supplemental documents in their possession and control:

Plaintiff's Bate Stamp Nos. 000749 – 000941 – Plaintiffs' counsel will forward Plaintiffs' Bate Stamped Exhibits under separate cover to Defendant's counsel.

Document Type	Bate Stamp #
Pamela Edwards – Documents regarding communications with Enviroclean, USA	000749 – 000758
Pamela Edwards – Documents regarding communications with backgroundchecks.com	000759 – 000762
Pamela Edwards – November 29, 2011 letter from Florida Department of Law Enforcement – stating no criminal history record exists in the State of Florida	000763 – 000765
Supplemental Documents regarding Kelvin Thomas	000766 – 000783
Supplemental Documents regarding Ronald Johnson	000784 – 000798
Information obtained from www.backgroundsonline.com website	000799 – 000941

Respectfully submitted,

BY:

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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